

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

_____	]	
UNITED STATES OF AMERICA	]	
	]	
v.	]	No. 12-cr-130-01-SM
	]	
FREDERICK V. McMENIMEN III	]	
_____	]	

**DEFENDANT’S LIST OF POTENTIAL WITNESSES**

Defendant Frederick V. McMenimen III, through his counsel, respectfully gives notice that, in addition to those on the government’s witness list, during his case he may call one or more of the following people as witnesses:

1. Sherry L. Aube  
Biddeford, ME
2. William J. Cuff  
Gloucester, MA
3. John J. Depratti  
Natick, MA
4. Nancy Salovitch  
Sandown, NH
5. Jeanne M. Powers  
South Weymouth, MA
6. Deborah Raffalli  
North Andover, MA
7. Jonathan Norton  
Kennebunk, ME
8. Nancy Favara  
Rye, NH

9. Special Agent Brian Keefe  
Federal Bureau of Investigation

The defendant asks for leave to amend his witness list as may become appropriate and necessary during trial.

Respectfully submitted,  
FREDERICK V. McMENIMEN III  
By His Attorneys,

/s/ Bjorn Lange  
Bjorn Lange (NHBA #1426)  
Assistant Federal Public Defender  
Federal Defender Office  
The Ralph Pill Building  
22 Bridge Street – 3<sup>rd</sup> Fl.  
Concord, NH 03301  
(603)226-7360  
Bjorn\_Lange@fd.org

Date: October 29, 2014

/s/ William E. Christie  
William E. Christie  
Shaheen & Gordon (Concord)  
107 Storrs Street  
PO Box 2703  
Concord, NH 03302-2703  
(603)225-7262  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2014 the above document was served via ECF upon AUSA William Morse.

/s/ Bjorn Lange  
Bjorn Lange